

1 PAUL T. TRIMMER, ESQ.  
Nevada Bar No. 9291  
2 LYNNE K. MCCHRYSTAL, ESQ.  
Nevada Bar No. 14739  
3 **JACKSON LEWIS P.C.**  
4 300 S. Fourth Street, Suite 900  
Las Vegas, Nevada 89101  
5 Telephone: (702) 921-2460  
Facsimile: (702) 921-2461  
6 Email: [paul.trimmer@jacksonlewis.com](mailto:paul.trimmer@jacksonlewis.com)  
7 Email: [lynne.mcchrystal@jacksonlewis.com](mailto:lynne.mcchrystal@jacksonlewis.com)

8 *Attorneys for Defendants*  
9 *MGM Grand Hotel, LLC and*  
*MGM Resorts International*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 TRACEY KOONCE, an individual,  
13 Plaintiff,

14 vs.

15 MGM GRAND HOTEL, LLC, a Nevada  
Limited Liability Company; DOES I-X,  
16 inclusive; and ROE CORPORATIONS I-X,  
inclusive,

17 Defendants.  
18

19 PAUL TAYLOR, an individual,  
20 Plaintiff,

21 vs.

22 MGM GRAND HOTEL, LLC, a Nevada  
Limited Liability Company; DOES I-X,  
23 inclusive; and ROE CORPORATIONS I-X,  
inclusive,

24 Defendants.  
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26  
27  
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Case No.: 2:22-cv-02061-CDS-DJA  
(Lead Case)

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
PLAINTIFFS' CONSOLIDATED  
COMPLAINT**  
(First Request)

Consolidated With:  
Case No.: 2:22-cv-02069-CDS-DJA

1 DAVID PERSI, an individual,  
2 Plaintiff,

3 vs.

4 MGM GRAND HOTEL, LLC, a Nevada  
5 Limited Liability Company; DOES I-X,  
6 inclusive; and ROE CORPORATIONS I-X,  
7 inclusive,

8 Defendants

9 INGA HAKAN, an individual,  
10 Plaintiff,

11 vs.

12 MGM RESORTS INTERNATIONAL, a  
13 Foreign Corporation; DOES I-X, inclusive;  
14 and ROE CORPORATIONS I-X, inclusive,

15 Defendants.

Consolidated With:  
Case No.: 2:22-cv-02087-CDS-DJA

Consolidated With:  
Case No.: 2:22-cv-02087-CDS-DJA

16 IT IS HEREBY STIPULATED by and between Plaintiffs and Defendants, by and through  
17 their respective counsel, that Defendants MGM Grand Hotel, LLC and MGM Resorts International  
18 (“Defendants”), shall have an extension up to and including September 15, 2023, in which to file  
19 their response to Plaintiffs’ Consolidated Complaint. This Stipulation is submitted and based upon  
20 the following:

21 1. That this is the first request for an extension of time for Defendants to answer  
22 Plaintiffs’ Consolidated Complaint.

23 2. Due to the length of Plaintiffs’ Consolidated Complaint (41 pages, 398 paragraphs),  
24 and the inclusion of a new cause of action relating to at least one of the Plaintiffs, Defendants  
25 require additional time to complete their response.

26 3. The parties agreed to extend Defendants’ deadline to file a responsive pleading from  
27 September 8, 2023, to September 15, 2023.

28 4. Nothing in this Stipulation, nor the fact of entering to the same, shall have the effect  
of or be construed as waiving any claim or defense held by any party hereto.

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5. That this request is made in good faith and not for the purpose of delay

Dated this 8th day of September, 2023.

**JENNINGS & FULTON, LTD.**

**JACKSON LEWIS P.C.**

/s/ Logan G. Willson, Esq.

/s/ Lynne K. McChrystal

ADAM R. FULTON, ESQ.

PAUL T. TRIMMER, ESQ.

Nevada Bar No. 11572

Nevada Bar No. 9291

LOGAN G. WILLSON, ESQ.

LYNNE K. MCCHRYSTAL, ESQ.

Nevada Bar No. 14967

Nevada Bar No. 14739

2580 Sorrel Street

300 S. 4<sup>th</sup> Street, Ste. 900

Las Vegas, Nevada 89146

Las Vegas, Nevada 89101

*Attorneys for Plaintiffs*

*Attorneys for Defendants*

**ORDER**

IT IS SO ORDERED:



Daniel J. Albregts

United States Magistrate Judge

Dated: 9/8/2023